



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

JUN - 4 2009

Reply To: OCE-127

Mr. Ron Skinnarland
Waste Management Section Manager
Washington Department of Ecology
3100 Port of Benton Blvd.
Richland, Washington 99352

Dear Mr. Skinnarland:

This letter is to convey to you the United States Environmental Protection Agency's (EPA) report and comments for the oversight inspection conducted by your staff at U. S. Department of Ecology Hanford on April 14, 2009. As you can see, the report is in a checklist format with recommendations at the end for ways to improve the inspection and the report. Please share this information with your staff that participated in conducting the inspection.

Sincerely,

Jeff KenKnight, Manager
Air/ RCRA Compliance Unit

cc: Jack Boller, EPA

WA7 8967

6-4-09

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Jeff KenKnight. Manager
Air/ RCRA Compliance Unit

cc: Jack Boller, EPA

bcc: Barbara McCullough

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Region 10
RCRA Oversight Inspection Report

Instructions:

The form is divided into two parts. Part 1 is used during the actual inspection to record observations made in the field. Part 2 of the form is used to evaluate the State inspection report relative to field observations. Both parts of the oversight inspection report have to be completed by the EPA oversight inspector. In the remarks column, N/A may be appropriate in some instances.

Inspector: Jack Boller

Date: 4/14/09

Part 1

I. Facility Name: US DOE Hanford

EPA ID #: WA 7 89000 8967

☒ Used Oil

☐ Conditionally Exempt Small Quantity Generator

Facility Activities: ☐ Small Quantity Generator

☒ Generator

☐ Transporter

☒ Treatment/Storage/Disposal Facility

☒ Universal Waste

II. Inspection Type: ☒ CEI ☐ O & M

☐ CME ☐ Lab Audit

☐ Financial Records Review ☐ Compliance Monitoring Evaluation

☐ Non Financial Records Review ☐ CDI

☐ Other (specify) _____

Items to be Reviewed: ☐ Full Scope ☒ Limited Scope

Inspection Format: ☒ Joint Visit ☐ Independent Visit

III. EPA Oversight Inspector: Jack Boller

Organization: EPA RI0

Telephone: 206 553-2953

IV. Inspection Date(s): 4/14/09

V.	Pre-Inspection Review	<input checked="" type="radio"/> Yes	<input type="radio"/> No	Remarks
1.	Did the State inspector arrange the logistics of the inspection by assuring:			
	a. facility actively operating?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	b. EPA properly notified?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2.	Did the State transmit requested documents according to the established schedule?	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>
3.	Was the inspector prepared to conduct the inspection? The inspector should have pertinent information (permit application, previous inspection reports, waste types handled) and equipment (safety and sampling)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4.	Did the inspector present the appropriate identification and advise the owner/operator of the purpose of the inspection and briefly describe the agenda?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	Remarks
8. Was proper safety and sampling equipment used to perform the sampling?	<u> </u>	<u> </u>	<u>N/A</u>
9. Was the inspector helpful to the owner/operator by providing explanation of the regulations?	<u>X</u>	<u> </u>	<u> </u>
10. Was the inspector able to answer questions accurately or commit to provide answers at a later date?	<u>X</u>	<u> </u>	<u> </u>
11. If the facility was permitted, did the inspector determine compliance with permit-specific conditions?	<u>X</u>	<u> </u>	<u> </u>
12. Did the inspector perform an exit interview with the owner/operator summarizing the key findings of the inspection?	<u>X</u>	<u> </u>	<u> </u>

NOTE: The inspector should not make a finding of violation during the inspection, but should only discuss the findings.

VII. Knowledge of the Regulations

1. Was the inspector knowledgeable about hazardous waste regulations applicable to the facility?	<u>X</u>	<u> </u>	<u> </u>
2. Was the inspector aware of recent amendments to the regulations that may affect the conduct of the inspection?	<u>X</u>	<u> </u>	<u> </u>

VIII. Document Inspection (Review)

(Please note if review was performed prior to or during inspection.)

1. Did the inspector thoroughly review the following documents?

	Yes	No	<u>Remarks</u>
A. <u>For Generators:</u>			
• Inspection records for hazardous waste storage areas	<u>X</u>	—	_____
• Personnel training records	<u>X</u>	—	_____
• Contingency plan	<u>X</u>	—	_____
• Emergency equipment testing and maintenance records	<u>X</u>	—	_____
• Waste analysis records	<u>X</u>	—	_____
• Manifests and exception reports	<u>X</u>	—	_____
• State annual and/or EPA biennial reports	<u>X</u>	—	_____
• Waste minimization plan	<u>X</u>	—	_____
 B. <u>In addition, for TSDF's:</u>			
• Part A permit application or final issued permit	<u>X</u>	—	_____
• Part B application prior to permit issuance	—	—	<u>N/A</u>
• Operating record	<u>X</u>	—	_____
	Yes	No	<u>Remarks</u>

- | | | | |
|---|----------|---|------------|
| • Waste analysis plan | <u>X</u> | — | — |
| • Inspection schedule | <u>X</u> | — | — |
| • Closure and Post Closure Plan | <u>X</u> | — | — |
| • Financial instruments | <u>X</u> | — | — |
| • Ground Water Monitoring/Reports | — | — | <u>N/A</u> |
| • Other information (treatment plant operations, internal correspondence) | — | — | <u>N/A</u> |

Part 2

INSPECTION REPORT REVIEW

I.

Review of Inspection Report

Yes No Remarks

- | | | | |
|--|----------|---|---|
| 1. Did the inspector submit the completed inspection report within the established workplan deadlines? | <u>X</u> | — | — |
| 2. Did the inspection report contain factual observations rather than opinion? | <u>X</u> | — | — |

Comments: _____

- | | Yes | No | Remarks |
|--|-----------|-----------|-----------|
| 3. Was the report accurate and did it sufficiently document all the violations? Were the regulations interpreted correctly? | <u>X</u> | <u> </u> | <u> </u> |
| 4. Did the report contain a discussion of changes that have occurred at the facility since the previous inspection? | <u> </u> | <u>X</u> | <u> </u> |
| If not, explain items that should have been included: <u>None</u> | | | |
| <u> </u> | | | |
| <u> </u> | | | |
| 5. Did the inspection report accurately reflect the EPA oversight inspector's observations? If not, explain the differences. | <u>X</u> | <u> </u> | <u> </u> |
| <u> </u> | | | |
| <u> </u> | | | |
| <u> </u> | | | |
| 6. If non compliance was identified, was the violator identified as either a Secondary Violator or a Significant non-complier? | <u> </u> | <u>X</u> | <u> </u> |

II. Remarks

1. What is your overall assessment of the inspection and the inspection report?

The inspection was conducted
in a professional manner. The
inspector was knowledgeable of
the facility and the applicable regulations.

2. Describe recommendations that may improve the quality of the State inspection and/or the inspection report.

None

NOTE: Indicate whether the inspector is in need of additional training or is lacking a particular skill (e.g. hazardous waste sampling) needed for an adequate inspection.

3. Comments on the inspection that could have a bearing on the State inspector evaluation (e.g., facility status under litigation, inadequate time allocated to perform inspection, complex industrial processes and waste handling practices, or numerous regulated units located on site).

None